

Maren I. Christensen (SBN 320013)
Sabita J. Soneji (SBN 224262)
TYCKO & ZAVAREEI LLP
1970 Broadway, Suite 1070
Oakland, CA 94612
Phone: 510-254-6808
Fax: 202-973-0950
Email: mchristensen@tzlegal.com
Email: ssoneji@tzlegal.com
Attorney for Plaintiffs

Anna S. McLean (Cal. Bar No. 142233)
Jacqueline M. Simonovich (Cal. Bar. No. 319259)
SHEPPARD MULLIN RICHTER & HAMPTON LLP
Four Embarcadero Center, 17th Floor
San Francisco, CA 94111-4109
Phone: (415) 434-9100
Fax: (415) 434-3947
amclean@sheppardmullin.com
jsimonovich@sheppardmullin.com

Attorney for Defendants
MIKE STINSON, LINDA STINSON, THE STINSON
2009 GRANTOR RETAINED ANNUITY TRUST,
7HBF NO. 2, LTD., STARTUP CAPITAL
VENTURES, L.P., AND STEPHEN J. SHAPER

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

KIMETRA BRICE, et al

Plaintiffs,

v.

MIKE STINSON, et al,

Defendants.

Case Number: 3:19-cv-01481-WHO

**JOINT STIPULATION TO EXTEND
PLAINTIFFS' TIME TO RESPOND TO
MOTIONS TO DISMISS AND
DEFENDANTS' TIME TO REPLY TO
PLAINTIFFS' OPPOSITIONS AND
RESET HEARING DATE**

1 Pursuant to Civil Local Rule 6-1(b), Plaintiffs Kimetra Brice, Earl Browne, and Jill
2 Novorot (“Plaintiffs”); Defendants Mike Stinson, Linda Stinson, The Stinson 2009 Grantor
3 Retained Annuity Trust, 7HBF No. 2, Ltd., LLC, Startup Capital Ventures, L.P., and Stephen J.
4 Shaper (the “Stinson Defendants”), by and through their respective counsel, respectfully stipulate
5 as follows:

6 **WHEREAS,**

7 1. On March 21, 2019, Plaintiffs filed a Complaint against Defendants (Dkt. 1).

8 2. On December 18, 2019, Defendants Mike Stinson, Linda Stinson, 7HBF No. 2,
9 Ltd., LLC, and Stephen J. Shaper filed a Motion to Dismiss (Dkt. 82).

10 3. On December 18, 2019, Defendants Linda Stinson and Stephen J. Shaper filed a
11 separate Motion to Dismiss (Dkt. 83), and a corresponding request for judicial notice (Dkt. 84).

12 4. On December 18, 2019, Defendant The Stinson 2009 Grantor Retained Annuity
13 Trust filed a Motion to Dismiss (Dkt. 85).

14 5. Plaintiffs’ oppositions to the aforementioned Motions to Dismiss (Dkt. Nos.
15 82-85) were initially due January 2, 2020.

16 6. Due to the winter holidays, the parties stipulated, however, that Plaintiffs would
17 have until January 21, 2020 to respond to the aforementioned Motions to Dismiss (Dkt. No. 88),
18 which the Court approved on January 3, 2020 (Dkt. No. 89).

19 7. Plaintiffs and the Stinson Defendants engaged in meet and confers regarding
20 discovery matters and scheduled a mediation for February 18, 2020.

21 8. Given the mediation, the parties stipulated to continue the February 12, 2020
22 hearing date on the aforementioned Motions to Dismiss until April 8, 2020, and to extend the
23 time for Plaintiffs to respond to the Motions to Dismiss until March 11, 2020, with the Stinson
24 Defendants’ replies being due March 25, 2020 (Dkt. No. 90). The Court approved the parties’
25 stipulation on January 21, 2020 (Dkt. No. 91).

26 9. Due to the parties focusing on follow-up to the mediation rather than briefing and
27 related discovery disputes, the parties agree that Plaintiffs shall have until March 18, 2020 to
28 respond to the Stinson Defendants’ Motions to Dismiss, with the Stinson Defendants’ replies

being due April 1, 2020. The parties further agree that the hearing on the Stinson Defendants' Motions to Dismiss will be continued from April 8, 2020 until April 15, 2020.

THEREFORE, IT IS NOW HEREBY STIPULATED AND AGREED, by and between the undersigned, by and through their counsel that:

10. The deadline for Plaintiffs to respond to each of the Stinson Defendants' Motions to Dismiss (Dkt. Nos. 82-85) shall be March 18, 2020.

11. The deadline for Defendants to reply to Plaintiffs' oppositions shall be April 1, 2020.

12. The hearing on the Stinson Defendants' Motions to Dismiss shall be held on April 15, 2020 at 2 pm.

Dated: March 11, 2020

Respectfully submitted,

/s/ Maren I. Christensen

Maren I. Christensen (SBN 320013)
Sabita J. Soneji (SBN 224262)
TYCKO & ZAVAREEI LLP
1970 Broadway, Suite 1070
Oakland, CA 94612
Phone: 510-254-6808
Fax: 202-973-0950
Email: mchristensen@tzlegal.com
Email: ssoneji@tzlegal.com

Anna C. Haac (pro hac vice)
TYCO & ZAVAREEI LLP
1828 L St. N.W., Suite 1000
Washington, DC 20036
Phone: (202) 973-0900
Fax: (202) 973-0950
ahaac@tzlegal.com

Kristi C. Kelly (pro hac vice)
Andrew J. Guzzo (pro hac vice)
KELLY GUZZO, PLC
3925 Chain Bridge Road, Suite 202
Fairfax, VA 22030
Phone: (703) 424-7572
Fax: (703) 591-0167 Facsimile
kkelly@kellyguzzo.com
aguzzo@kellyguzzo.com

Attorneys for Plaintiffs

/s/ Jonathan Boughrum

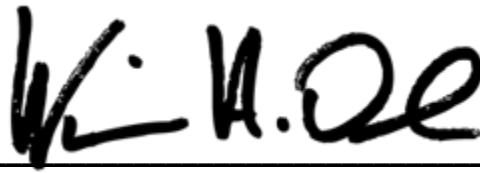
Jonathan Boughrum (pro hac vice)
Richard L. Scheff (pro hac vice)
David F. Herman (pro hac vice)
ARMSTRONG TEASDALE LLP
1500 Market Street, 12th Floor, East Tower
Philadelphia, PA 19102
Phone: (215) 246-3478
Fax: (215) 569-8228
jboughrum@armstrongteasdale.com
rlscheff@armstrongteasdale.com
dherman@armstrongteasdale.com

Anna S. McLean (Cal. Bar No. 142233)
Jacqueline M. Simonovich (Cal. Bar. No. 319259)
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Phone: (415) 434-9100
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amclean@sheppardmullin.com
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Attorneys for Defendants
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3 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**
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5
6 DATED: March 11, 2020
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A handwritten signature in black ink, appearing to read "W. H. Orrick", written over a horizontal line.

8 THE HON. WILLIAM H. ORRICK
9 United States District Judge
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ATTESTATION

I, Maren Christensen, hereby attest pursuant to N.D. Cal. Local Rule 5-1(i)(3), that all signatories to this document have concurred in this filing.

/s/ Maren I. Christensen

Maren I. Christensen